

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
Atlanta Division

FILED IN CLERK'S OFFICE  
U.S.D.C. Atlanta

MARY L. METZLER,

Plaintiff,

v.

GENERAL MOTORS CORPORATION,  
JEROME HUNTER, BARRY WOODS  
and GORDON ZIMMER

Defendants.

SEP 17 2004

LUTHER D. THOMAS, Clerk  
By:  
CIVIL ACTION FILE  
NUMBER: 1:03-CV-2625-BBM Deputy Clerk

**MOTION TO EXTEND TIME PERIOD  
FOR DISCOVERY AND OTHER MATTERS**

COMES NOW Defendant Mary L. Metzler, by and through undersigned counsel, and files this Motion to Extend Time Period for Discovery and Other Matters, and shows this Honorable Court and Plaintiff as follows:

1.

The discovery period in this case is scheduled to conclude on September 18, 2004.

2.

Due to two relocations of the Plaintiff out of the Atlanta area, once to Alabama and once to Florida, when combined with the extraordinarily complex nature of this case, the high number of documents involved in the case, the geographic diversity of the Defendants and potential witnesses, the Plaintiff requires additional time to complete discovery in this matter.

3.

Specifically, the relocation of the Plaintiff out of the Atlanta area, once to Alabama and once to Florida within the last year, has been greatly hindered attorney for Plaintiff's ability to conduct discovery.

4.

Attorney for Plaintiff did not and could not have anticipated the two relocations by the Plaintiff out of the Atlanta area which have caused the necessity for additional discovery time.

5.

The Plaintiff, therefore, requests that the discovery deadline in this case be extended until January 7, 2005, and that the deadlines for all other matters be adjusted accordingly.

6.

The Defendants expressly do **not** object to the granting of this motion extending the time period for discovery and other matters

7.

This Honorable Court, the Defendants and the interests of justice will **not** be prejudiced by the granting of this motion.

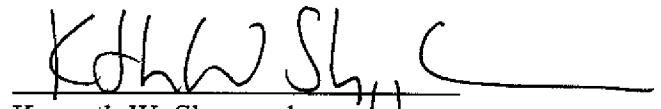
8.

The interests of justice and judicial economy will best be served by granting this motion and allowing the Plaintiff additional time to complete discovery.

9.

This Court should extend the discovery deadline in this case until January 7, 2005, and adjust the deadlines for all other matters accordingly.

Respectfully submitted this 17<sup>th</sup> day of September, 2004.



Kenneth W. Sheppard  
Kenneth W. Sheppard  
Georgia Bar No. 641958

Attorney for Plaintiff

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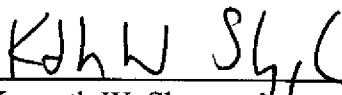
**CERTIFICATE OF SERVICE**

The undersigned attorney states that he served the foregoing **MOTION TO EXTEND TIME PERIOD FOR DISCOVERY AND OTHER MATTERS** upon all counsel by placing a copy of same in the United States Mail with adequate postage affixed thereto and addressed as follows:

David C. Vogel  
Lathrop & Gage L.C.  
2345 Grand Boulevard; Suite 2800  
Kansas City, Missouri 64108-2684

Respectfully submitted this 17<sup>th</sup> day of September, 2004.

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